Exhibit 1

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

PREP SOLUTIONS LTD.,	§	Civil Action No. 2:23-cv-211-JRG
	§	
Plaintiff,	§	
	§	
V.	§	
	§	JURY TRIAL DEMANDED
TECHONO LTD., et al.,	§	
	§	
Defendants.	§	
	§	

DECLARATION OF DARIA TARASEVICH

- I, Daria Tarasevich, provide this declaration and declare as follows:
- 1. I make this declaration upon personal knowledge and, if called to testify, could and would testify to the facts set forth herein.
 - 2. I am an adult resident of Minsk, Belarus, and I am employed by Testking Ltd.
- 3. I am the Chief Operations Officer for Testking Ltd. I have served in this position for 9 years and have worked 9 years for Tesking Ltd in total. I graduated from the Faculty of Applied Mathematics and Computer Science of Belarusian State University.
- 4. Prep Solutions Ltd. hired Testking as an independent contractor to create, manage, and maintain content for Prep Solutions' website, www.prepaway.com. My operations team and I also provide general operational support to Prep Solutions for its global business operations.
- 5. In response to Defendant Elephant Projects, Ltd.'s Motion to Dismiss, counsel for Prep Solutions has asked my operations team and I to review web traffic statistics for Elephant Projects, Ltd.'s website, testpreptraining.com, along with the registration and hosting information for the website. Below is the information we have verified for the testpreptraining.com website.

- 6. My team and I performed a WHOIS search for the domain name testpreptraining.com. The full report is included as Attachment 1 to this declaration. The search revealed the registrar for the domain is Go Daddy Inc. and the registrant for the site is Domains By Proxy, LLC, which to my understanding provides the WHOIS privacy service for Go Daddy Inc. According to the WHOIS report, the address for both Domains By Proxy, LLC and GoDaddy Inc. is 2155 E Warner Rd, Tempe, Arizona 85284.
- 7. According to the WHOIS database, the domain name servers (DNS) for testpreptraining.com are operated by Cloudflare, Inc., a company based in San Francisco, California. The domain name servers are HAYES.NS.CLOUDFLARE.COM and MIRA.NS.CLOUDFLARE.COM. My team and I confirmed that both of the DNS servers are located in San Francisco, California. The specific information regarding the location for the testpreptraining.com name servers is included as Attachment 2 of this declaration.
- 8. Counsel for Prep Solutions provided me with access to the SemRush platform. SemRush is a platform that provides competitive analysis information, site audits, and web traffic analytics. SemRush is one of the leading tools available for third-party website analysis. To analyze web traffic, SemRush uses "petabytes of clickstream data [a record of an individuals clicks through their journey on the internet] that comes from multiple proprietary and 3rd party data sources. Semrush's proprietary AI algorithm accumulates, cleans, and processes the raw data, giving you an accurate view of online journeys and online activity of over 200 million real but anonymized internet users." After accumulating, cleaning, and processing the raw data, SemRush provides estimates for desktop and mobile traffic for specific websites. Without the ability to track

¹ Traffic Analytics: Frequently Asked Questions, SemRush, https://www.semrush.com/analytics/traffic/.

website traffic using a first-party, internal tracking tool, such as Google Analytics, SemRush's

external traffic analytics is the best alternative.²

9. I reviewed the SemRush Traffic Analytics Reports for testpreptraining.com for

worldwide and U.S.-based traffic for the last two years. These reports are included as Attachment

3 of this declaration. The SemRush worldwide report estimates that testpreptraining.com has

received 7.7. million visits from all internet users across the world since September 2021.

SemRush estimates that 2.6 million of these visits have come from the United States, which

accounts for 34.22% of the total visits to testpreptraining.com and more visits than from any other

single country. Additionally, the U.S.-only traffic report estimates that 60.9% of the U.S. visits

resulted from organic searches using a search engine. A high rate of traffic originating from search

engines suggests that Elephant Projects may be engaging in organic search engine optimization

(SEO) efforts to increase traffic organic to testpreptraining.com.

I declare under penalty of perjury that the foregoing is true and correct to the best of my

knowledge

Executed on September 25, 2023

Daria Tarakavich

² See id.

Attachment 1

ICANNILOOKUP(/en)

Registration data lookup tool

Enter a domain name or an Internet number resource (IP Network or ASN) Frequently Asked Questions (FAQ) (/en/faq)

testpreptraining.com

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN <u>Privacy Policy (https://www.icann.org/privacy/policy)</u>, and agree to abide by the website <u>Terms of Service (https://www.icann.org/privacy/tos)</u> and the <u>registration data lookup tool Terms of Use (unsafe:javascript:void(0))</u>.

Domain Information

Name: TESTPREPTRAINING.COM

Registry Domain ID: 2223260036 DOMAIN COM-VRSN

Domain Status:

<u>clientDeleteProhibited (https://icann.org/epp#clientDeleteProhibited)</u>
<u>clientRenewProhibited (https://icann.org/epp#clientRenewProhibited)</u>
<u>clientTransferProhibited (https://icann.org/epp#clientTransferProhibited)</u>
<u>clientUpdateProhibited (https://icann.org/epp#clientUpdateProhibited)</u>

Nameservers:

HAYES.NS.CLOUDFLARE.COM MIRA.NS.CLOUDFLARE.COM

Dates

Registry Expiration: 2024-02-05 11:39:34 UTC

Updated: 2022-10-09 05:05:15 UTC

Created: 2018-02-05 11:39:34 UTC

Contact Information

Registrant:

Handle: 1

Name: Registration Private

Organization: Domains By Proxy, LLC

Kind: individual

Mailing Address: DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

Contact Uri: https://www.godadd
y.com/whois/results.aspx?domain=testpreptraining.com)

Administrative:

Handle: 2

Name: Registration Private

Organization: Domains By Proxy, LLC

Kind: individual

Mailing Address: DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

Contact Uri: https://www.godaddy.com/whois/results.aspx?domain=testpreptraining.com (https://www.godadd

y.com/whois/results.aspx?domain=testpreptraining.com)

Technical:

Handle: 3

Name: Registration Private

Organization: Domains By Proxy, LLC

Kind: individual

Mailing Address: DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

Contact Uri: https://www.godaddy.com/whois/results.aspx?domain=testpreptraining.com (https://www.godadd

<u>y.com/whois/results.aspx?domain=testpreptraining.com)</u>

Billing:

Handle: 4

Name Registration Private JRG Document 15-1 Filed 09/26/23 Page 8 of 19 PageID #: 1764

Organization: Domains By Proxy, LLC

Kind: individual

Mailing Address: DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

Contact Uri: https://www.godaddy.com/whois/results.aspx?domain=testpreptraining.com (https://www.godadd

<u>y.com/whois/results.aspx?domain=testpreptraining.com)</u>

Registrar Information

Name: GoDaddy.com, LLC

IANA ID: 146

Abuse contact phone: tel:480-624-2505

DNSSEC Information

Delegation Signed: Unsigned

Authoritative Servers

Registry Server URL: https://rdap.verisign.com/com/v1/domain/testpreptraining.com (https://rdap.verisign.com/com/v1/domain/testpreptraining.com (https://rdap.verisign.com/com/v1/domain/testpreptraining.com (https://rdap.verisign.com/com/v1/domain/testpreptraining.com (https://rdap.verisign.com/com/v1/domain/testpreptraining.com (https://rdap.verisign.com/com/v1/domain/testpreptraining.com/ (https://rdap.verisign.com/ (<a href="https://rdap.veri

Last updated from Registry RDAP DB: 2023-09-24 11:07:07 UTC

Registrar Server URL: https://rdap.godaddy.com/v1/domain/TESTPREPTRAINING.COM (https://rdap.godaddy.com/v1/domain/TESTPREPTRAINING.C

Last updated from Registrar RDAP DB: 2023-09-24 11:07:25 UTC

Notices and Remarks

Notices:

Status Codes

For more information on Whois status codes, please visit https://www.icann.org/epp For more information on domain status codes, please visit https://icann.org/epp https://icann.org/epp (https://icann.org/epp)

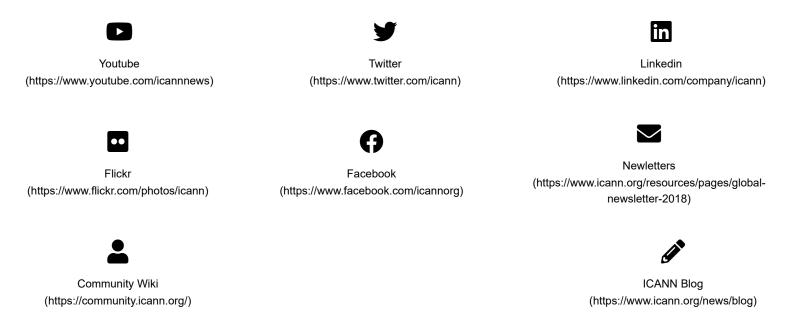
RDDS Grace Gracy Complaint Form Document 15-1 Filed 09/26/23 Page 9 of 19 PageID #: 1765

URL of the ICANN RDDS Inaccuracy Complaint Form: https://www.icann.org/wicf https://www.icann.org/wicf (https://www.icann.org/wicf)

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By submitting an inquiry, you agree to these Universal Terms of Service and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes, or use this data in any way that violates applicable laws and regulations.

https://www.godaddy.com/agreements/showdoc?pageid=5403 (https://www.godaddy.com/agreements/showdoc?pageid=5403)



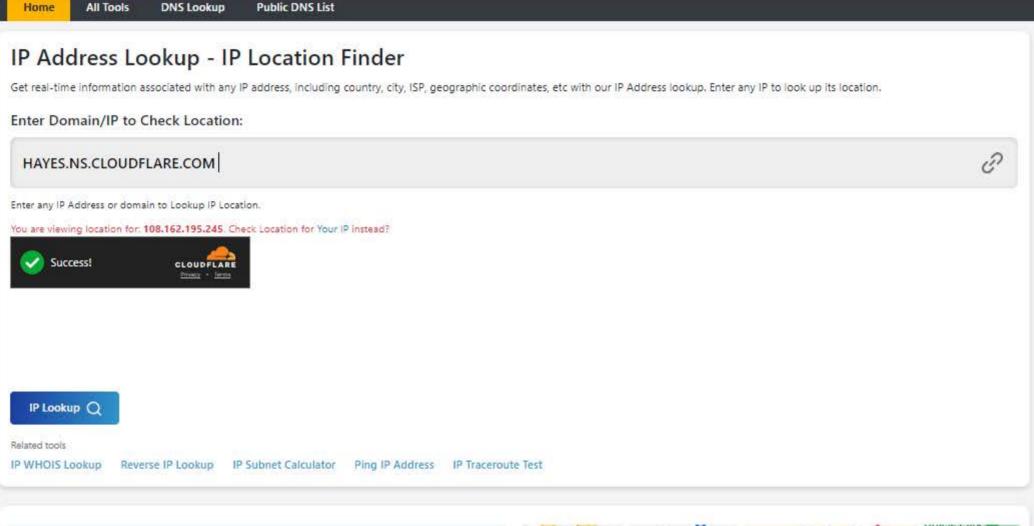
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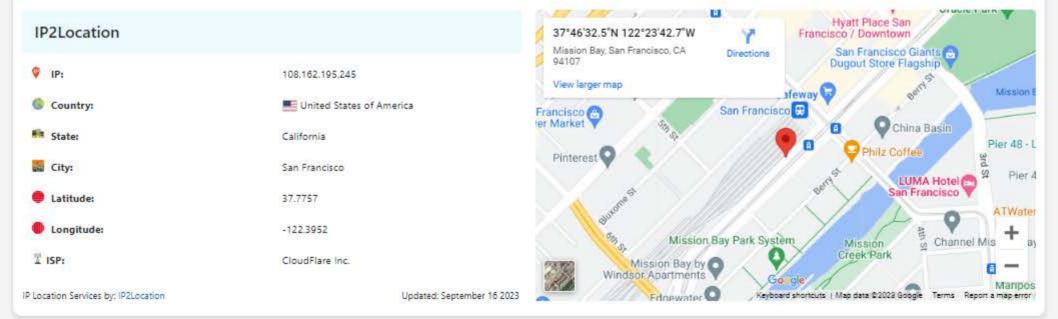
Attachment 2



9 66.28.223.242

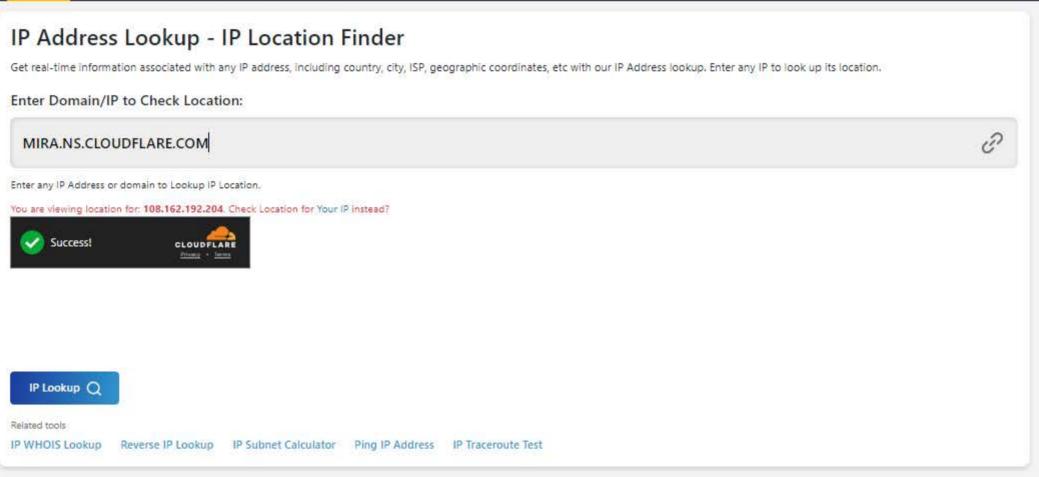


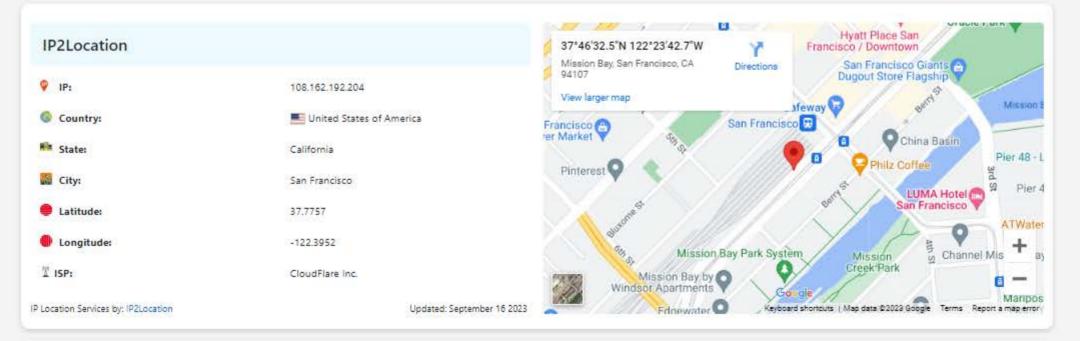






6





Attachment 3

